

SUPREME CONTROL OF THE STATE OF

MAIN OFFICE 9 GARDEN STREET MOUNT HOLLY, NEW JERSEY 08060

> CAMDEN COUNTY OFFICES 511 MARKET STREET CAMDEN, NEW JERSEY 08102

118 WHITE HORSE ROAD WEST VOORHEES, NEW JERSEY 08043

> TELEPHONE: 609.216.7400 FACSIMILE: 609.207.3767

EMAIL: Daniel@RosenbergPerry.com

DANIEL M. ROSENBERG (NJ, NY & PABARS)†
ROBERT M. PERRY (NJ BAR)†
NATHAN J. MAMMARELLA (NJBAR)
M. EDWARD RIVAS (NJ BAR)
BRANDON SWEENEY (NJ BAR)
JOHN S. SITZLER (NJBAR)*
PASQUALE GUGLIETTA (NJBAR)*
DEREK A. DECOSMO (NJ & PABARS)*
DANIEL I. WARD, LLM (NJ, PA & FL BARS)*
† Certified by the Supreme Court of New Jersey as a Criminal Trial Attorney

* Of Counsel

October 30, 2023

Honorable Michael A. Shipp United States District for the District of New Jersey Clarkson S. Fisher Federal Building & U.S. Courthouse 402 East State Street Trenton, New Jersey 07102

RE: Ur

United States v. Michael Lawson

Crim No. 13-253 (MAS)

Dear Judge Shipp:

As this Court is aware, the sentencing date for defendant, Michael Lawson, was originally scheduled for August 3, 2023, yet necessitated an adjournment because of Mr. Lawson's required surgery. Mr. Lawson's preoperative (and postoperative) diagnoses revealed "Bilateral hip arthritis, right greater than left, right aggravated by assault in Prague." Mr. Lawson thereby underwent a total right hip replacement on September 27, 2023, necessitating two (2) full days in the hospital. Mr. Lawson's surgeon, Peter F. Holmes, M.D. estimated as of October 13, 2023 that recovery would require "a minimum of 3 or 4 months" in order "to heal as the muscles recover from the assault and from the hip replacement." (See Operative Report and Postop Impression from Dr. Peter F. Holmes, M.D., attached hereto).

Based on the foregoing, defendant respectfully requests that his sentencing be adjourned

WWW.ROSENBERGPERRY.COM

Honorable Michael A. Shipp October 30, 2023 Page 2

to a date in late February to accommodate for his period of recovery. The Government is aware of this request and has graciously consented to same.

Should your Honor require any additional information in order to consider this request, kindly advise. Thank you in advance for your time and consideration.

Respectfully,

Daniel M. Rosenberg

> _/_

DMR/pg Enclosures

cc: Assistant United States Attorney Eric Suggs U.S.P.O. Matthew Hulick

So Ordered this _____ day of _____ vender, 20 & 3

Hon. Michael Shipp, USDJ